



THE CITY OF NEW YORK
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August 11, 2025

BY ECF

Honorable Dale E. Ho
United States District Judge
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: Steven Dominguez v. City of New York, et al., 21-CV-02302 (DEH)

Your Honor:

I am a Senior Counsel in the office of Muriel Goode-Trufant, Corporation Counsel of the City of New York, and the attorney representing defendants in the above-referenced action. In that capacity, I write to respectfully request that the Court adjourn the August 21, 2025 status conference until a later date as soon as practicable that is convenient to the Court. Plaintiff's counsel consents to this request. The reason for this request is that the undersigned is beginning a trial on August 18, 2025, in the matter of Robert Burroughs v. City of New York, et al., 22 CV 4463 (WFK) (RML), before the Honorable William F. Kuntz, II. The parties projected in their Joint Pretrial Order that it will take three to four days until the case gets to a jury. Accordingly, there is a very likely scenario that I will still be on trial in the EDNY the morning of August 21, 2025.

Should the Court grant this request, the next days the parties would be available are August 26, 2025, through August 29, 2025.¹ Consistent with this request, defendants would also respectfully request that their time to respond to plaintiff's application be adjourned until some time during the week of August 25, 2025. Plaintiff's counsel consents to this request as well. Should the Court be amenable to rescheduling the status conference as requested,

¹ The undersigned has a personal obligation on August 22, 2025, assuming my trial has finished while plaintiff's counsel has informed me that he has a mediation scheduled on August 25, 2025.

defendants will be able to respond as soon in advance of same as is necessary for the Court to sufficiently review the parties' submissions.

Plaintiff's counsel also wishes to advise the Court that earlier today, Judge Rakoff scheduled the case referenced in their motion to adjourn the trial, Staley, et al. v Hotel 57 Services, LLC, 22-CV-6781 (JSR) to begin trial on September 10, 2025 in the Southern District of New York.

Thank you for your consideration herein.

Respectfully submitted,

/s/

Brian Francolla
Senior Counsel
Special Federal Litigation Division

cc: All Counsel (By ECF)

Application GRANTED. The conference previously scheduled for August 21, 2025 is hereby ADJOURNED to **September 3, 2025 at 10:00 AM** in Courtroom 905 of the Thurgood Marshall Courthouse. Defendants' response to Plaintiff's letter is now due August 26, 2025.

SO ORDERED.



Dale E. Ho
United States District Judge
Dated: August 12, 2025
New York, New York